

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION**

FAURECIA SISTEMAS  
AUTOMOTRICES DE MEXICO  
SA DE CV,

Case No. 2:23–CV–10763

*Plaintiff,*

v.

Hon. Gershwin A. Drain

CAMACO, LLC,

*Defendant.*

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BUTZEL LONG, P.C.  
Cynthia J. Haffey (P57352)  
David J. DeVine (P70012)  
150 W. Jefferson Ave., Suite 100  
Detroit, MI 48226  
(313) 225-7000  
[haffey@butzel.com](mailto:haffey@butzel.com)  
[DeVine@butzel.com](mailto:DeVine@butzel.com)  
*Attorneys for Plaintiff*

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Scott T. Seabolt (P55890)  
Adam G. Winnie (P82820)  
HICKEY HAUCK BISHOFF  
JEFFERS & SEABOLT, PLLC  
706 S. Main  
Plymouth, MI 48170  
(313) 964-8600  
[sseabolt@hhbjs.com](mailto:sseabolt@hhbjs.com)  
[awinnie@hhbjs.com](mailto:awinnie@hhbjs.com)  
*Attorneys for Defendant*

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**RESPONSE TO PLAINTIFF’S MOTION  
TO EXPEDITE CONSIDERATION  
OF PLAINTIFF’S TO STAY AND ENJOIN ARBITRATION**

Defendant Camaco, LLC, (“Camaco”) by and through its undersigned counsel, hereby responds to the Motion for Expedited Consideration of Plaintiff’s Motion to Stay and Enjoin Arbitration, filed by Plaintiff Faurecia Sistemas Automotrices de Mexico SA de CV (“Plaintiff” or “Forvia”).

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## **QUESTION PRESENTED**

1. Is Forvia's request for expedited consideration of its Motion to Stay and Enjoin Arbitration moot as a result of the parties' agreement to hold the arbitration in abeyance pending the Court's ruling on Forvia's Motion to Stay?

**Defendant Camaco Answers: Yes**

**The Court should answer: Yes**

**CONTROLLING AND MOST APPROPRIATE AUTHORITY**

Fed. R. Civ. P. 6(c)(1)(C)

## **BRIEF IN SUPPORT**

Camaco hereby incorporates and refers the Court to Camaco's Response to Forvia's Motion to Stay and Enjoin Arbitration (ECF No. 11, PageID.206 *et seq.*) for a fuller explanation of the relevant facts and circumstances leading to this dispute, as well as an explanation as to why these parties and this dispute is subject to an existing arbitration agreement.

For purposes of Forvia's instant Motion to Expedite, while Camaco maintains that the arbitration should proceed as filed by Camaco, the parties have reached an agreement in principle to hold the arbitration in abeyance pending the Court's resolution of Forvia's pending Motion. Counsel is in the process of drafting a joint letter to the American Arbitration Association to inform the AAA of this request. This renders moot Forvia's request for expedited consideration, and also removes the only justification Forvia asserted for that request—i.e. that, absent immediate consideration, the arbitration will be proceeding.

HICKEY HAUCK BISHOFF  
JEFFERS & SEABOLT, PLLC

By: /s/ Scott T. Seabolt  
Scott T. Seabolt (P55890)  
706 S. Main  
Plymouth, MI 48170  
(313) 964-8600  
sseabolt@hbjbs.com

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